

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

LAQUITA OLIVER, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

NAVY FEDERAL CREDIT UNION,

Defendant.

Civ. No. 23-cv-01731

**JOINT MOTION FOR ENTRY OF AN ORDER  
SCHEDULING A RULE 16 PRETRIAL CONFERENCE**

Plaintiffs and Defendant Navy Federal Credit Union (“Navy Federal”), through their undersigned counsel, hereby respectfully request the Court schedule a pretrial conference pursuant to Fed. R. Civ. P. 16 in this matter for April 25, 2024, or as soon thereafter as is convenient for the Court.

On December 29, 2023, Plaintiffs moved to consolidate *Oliver, et al. v. Navy Federal Credit Union*, 23-cv-01731 and *Hicks, et al. v. Navy Federal Credit Union, et al.*, 23-cv-01798 matters (the “Motion”). ECF. No. 9. Navy Federal did not oppose the Motion. ECF. No. 21. On January 10, 2024, a complaint was filed in *Robinson, et al. v. Navy Federal Credit Union*, 24-cv-00049. On January 17, 2024, Plaintiffs requested that *Robinson* also be consolidated, without opposition from Navy Federal. ECF. No. 31. On January 18, 2024, the Court granted the Motion and consolidated all three cases, directing Plaintiffs to file a consolidated complaint “within thirty (30) days of [January 18, 2024],”

and the responsive pleading to be filed “within thirty (30) days” of the date the consolidated complaint is filed. ECF. No. 32.

Pursuant to Federal Rule 26, the Rule 26(f) conference among the undersigned counsel must occur 21 days prior to the Rule 16 pretrial conference. The parties agree that the Rule 26(f) conference and any discovery would be most productive after Navy Federal has had an opportunity to review Plaintiffs’ consolidated complaint, and Plaintiffs have an opportunity to review Navy Federal’s initial responsive pleading.

In light of the current deadline for the filing of the consolidated complaint, the parties jointly request the Court to schedule a Rule 16 pretrial conference on April 25, 2024, or on a date as soon thereafter as is convenient for the Court, which will permit the parties to conduct a Rule 26(f) conference on or before April 4, 2024, with the report due to the Court on or before April 11, 2024.

Dated: February 20, 2024

Respectfully submitted,

/s/ Michaela Wilkes Klein

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***Additional Counsel for Plaintiffs and the  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 20, 2024, I caused the foregoing to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

Dated: February 20, 2024

Respectfully submitted,

/s/ Michaela Wilkes Klein

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